

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ON SEMICONDUCTOR CORP. and)	
SEMICONDUCTOR COMPONENTS)	
INDUSTRIES, LLC,)	
)	
Plaintiffs,)	Civil Action No. 07-449 (JJF)
v.)	
)	
SAMSUNG ELECTRONICS CO., LTD.,)	
SAMSUNG ELECTRONICS AMERICA, INC.,)	
SAMSUNG TELECOMMUNICATIONS)	
AMERICA GENERAL, L.L.C.,)	
SAMSUNG SEMICONDUCTOR, INC., and)	
SAMSUNG AUSTIN SEMICONDUCTOR L.L.C.,)	
)	
Defendants.)	
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SAMSUNG ELECTRONICS CO., LTD.,)	
SAMSUNG ELECTRONICS AMERICA, INC.,)	
SAMSUNG TELECOMMUNICATIONS)	
AMERICA GENERAL, L.L.C.,)	
SAMSUNG SEMICONDUCTOR, INC., and)	
SAMSUNG AUSTIN SEMICONDUCTOR L.L.C.,)	
)	
Plaintiffs,)	Civil Action No. 06-720 (JJF)
v.)	
)	
ON SEMICONDUCTOR CORP. and)	
SEMICONDUCTOR COMPONENTS)	
INDUSTRIES, LLC,)	
)	
Defendants.)	

**ON SEMICONDUCTOR CORP. AND SEMICONDUCTOR COMPONENTS
INDUSTRIES, LLC'S MOTION TO COMPEL DISCOVERY**

ON Semiconductor Corp. and Semiconductor Components Industries, LLC
(collectively, "ON Semiconductor") hereby move to compel Samsung Electronics Co., Ltd.,
Samsung Electronics America, Inc., Samsung Telecommunications America General, LLC,

Samsung Semiconductor, Inc. and Samsung Austin Semiconductor, LLC (collectively, “Samsung”) to produce the following documents and information:

- 1) Technical information and documents showing the design and layout of the accused products including schematic and GDS2 database systems used to design and fabricate Samsung’s accused products;
- 2) Manufacturing process information, including process flows, used in manufacturing the products accused of infringing ON Semiconductor’s process patent; and
- 3) All pleadings, transcripts, expert reports, settlement agreements and exhibits from legal or administrative proceedings involving the Samsung products at-issue in this case.

The grounds for this motion are set forth in ON Semiconductor’s opening brief, filed herewith.

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February 7, 2008

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RULE 7.1.1. CERTIFICATE

Pursuant to D. Del. L.R. 7.1.1, this is to certify that counsel for ON Semiconductor has discussed the subject matter of this motion with counsel for Samsung and has not been able to reach agreement on the matters therein.

/s/ Richard J. Bauer (#4828)

Richard J. Bauer (#4828)

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on February 7, 2008 I electronically filed the foregoing with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to the following:

John W. Shaw
Andrew A. Lundgren

I also certify that copies were caused to be served on February 7, 2008 upon the following in the manner indicated:

BY HAND AND EMAIL

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